UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

OCT 14 2015

CERTIFIED MAIL 7009 1680 0000 7669 3462
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF:

Mr. George Koleas
Human Resources Director
Tulip Corporation
714 East Keefe Avenue
Milwaukee, Wisconsin 53212

Re: Notice of Violation
Compliance Evaluation Inspection
EPA ID: WID006113013

Dear Mr. Koleas:

On March 20, 2015, a representative of the U.S. Environmental Protection Agency inspected the Tulip Corporation ("Tulip") located in Milwaukee, Wisconsin. As a small quantity generator of hazardous waste, Tulip is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq. (RCRA). The purpose of the inspection was to evaluate Tulip's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Tulip, EPA's review of records pertaining to Tulip, and the inspector's observations, EPA has determined that Tulip has unlawfully treated and stored hazardous waste without a license or interim status.

Tulip violated licensing requirements by conducting treatment in an unlicensed unit. EPA has identified this violation in paragraph 1, below.

Tulip also failed to comply with certain generator-specific conditions for a license exemption under Wis. Admin. Code § NR 662.192(1) and (4) [40 C.F.R. § 262.34(c) - (f)]. EPA has identified the license exemption conditions with which Tulip was out of compliance at the time of the inspection in paragraphs 2 – 6, below.

- The conditions identified in paragraphs 2 – 4 are also independent license exemption requirements for generators that are in and of themselves violable.
- The conditions identified in paragraphs 5 – 6 are also independent license exemption requirements incorporated from Wis. Admin. Code ch. NR 665 [40 C.F.R. Part 265] that apply to licensed and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSDF requirements). When a hazardous waste generator loses its license exemption due to a failure to comply with an exemption condition incorporated from the TSDF requirements, the generator: (a) reverts back to being an operator of a hazardous waste storage facility requiring a license; and (b) simultaneously violates the corresponding TSDF requirement either in Wis. Admin. Code ch. NR 665 [40 C.F.R. Part

265] should the facility have fully complied with the requirements for interim status, or in Wis. Admin. Code ch. NR 664 [40 C.F.R. Part 264] should the facility have been licensed.

Lastly, EPA has determined that Tulip violated RCRA generator requirements related to hazardous waste determinations, manifests, and universal waste, as described in paragraphs 7 – 9, below.

TREATMENT OF HAZARDOUS WASTE WITHOUT A LICENSE OR INTERIM STATUS

1. Under Wis. Admin. Code § NR 670.001(3), Section 291.25 (2), Stats., requires a license for the operation of a treatment, storage or disposal facility where any hazardous waste identified or listed in ch. NR 661 is managed. The terms "treatment," "storage," "disposal" and "hazardous waste" are defined in s. NR 670.002. See also 40 C.F.R. § 270.1(c).

   At the time of the inspection, Tulip was accumulating spent mop water contaminated with lead-bearing solids in three 55-gallon drums near their 180-day hazardous waste storage area. These containers are each placed into a drum evaporator unit located in the "Old Boiler Room" in order to reduce the volume of the waste. Evaporators, which are considered thermal treatment units by the EPA and WDNR, are subject to licensing requirements. Tulip was not licensed for this treatment activity.

STORAGE OF HAZARDOUS WASTE WITHOUT A LICENSE OR INTERIM STATUS THROUGH VIOLATIONS OF LICENSE EXEMPTION REQUIREMENTS OR OF TSDF REQUIREMENTS

The license exemption conditions identified in paragraphs 2 - 4, below, are also license exemption requirements violated by Tulip:

2. Start Dates of Accumulation

   Under Wis. Admin Code § NR 662.192(1)(d)1. [40 C.F.R. §§ 262.34(d)(4); 262.34(a)(2)], a small quantity generator may accumulate hazardous waste for 180-days or less provided he ensures that the date upon which each period of accumulation begins is clearly marked and is visible for inspection on each container.

   At the time of the inspection, nine 55-gallon drums of spent materials contaminated with lead, including, but not limited to filter bags, rags, gloves, floor sweepings, and respirator cartridges, were located in the 180-day storage area and were not marked with start dates of accumulation. In addition, three 55-gallon drums of mop water and solids near the 180-day storage area were not marked with start dates of accumulation.

3. Labeling Containers as "Hazardous Waste"

   Under Wis. Admin. Code § NR 662.192(1)(d)2. [40 C.F.R. §§ 262.34(d)(4); 262.34(a)(3)], a small quantity generator of hazardous waste must ensure that each container is labeled or marked clearly with the words, "Hazardous Waste."

   At the time of the inspection, five 55-gallon drums of spent materials contaminated with lead, including, but not limited to filter bags, rags, gloves, floor sweepings, and respirator cartridges, were located in the 180-day storage area and were not labeled or marked with the

words "Hazardous Waste." In addition, three 55-gallon drums of mop water located near the 180-day area were not marked as "Hazardous Waste."

4. Emergency Procedures

Under Wis. Admin. Code §§ NR 662.192(1)(e)2.a.-c. [40 C.F.R. §§ 262.34(d)(5)(ii)(A)-(C)], a small quantity generator must post the following information next to the telephone:

- The name and telephone number of the emergency coordinator;
- Location of fire extinguishers and spill control material, and if present, fire alarm; and
- The telephone number of the fire department, unless the facility has a direct alarm.

At the time of the inspection, Tulip did have a posting that included the emergency coordinator's information as well as an emergency number for the fire department. The posting did not, however, include locations of fire extinguishers, spill control material, or the fire alarm.

The license exemption conditions identified in paragraphs 5 and 6, below, are also independent TSDF requirements violated by Tulip:

5. Weekly Inspections

Under Wis. Admin. Code §§ NR 662.192(1)(b); 665.0174 [40 C.F.R. §§ 262.34(d)(2); 265.174], a small quantity generator of hazardous waste must conduct inspections of the areas where hazardous waste is stored at least weekly.

At the time of the inspection, Tulip was not conducting weekly inspections in the areas where lead-contaminated spent materials were being stored.

6. Aisle Space

Under Wis. Admin Code §§ NR 662.192(1)(d); 665.0035 [40 C.F.R. §§ 262.34(d)(4); 265.35], a small quantity generator of hazardous waste must maintain aisle space to allow the unobstructed movement of personnel and emergency or decontamination equipment to any area of facility operation in an emergency.

At the time of the inspection, aisle space was minimal around the containers in the 180-day storage area. Containers had to be moved in order to see their condition and any labels.

Summary of license exemption conditions: By violating the conditions for a license exemption, above, Tulip became an operator of a hazardous waste storage facility, and was required to obtain a Wisconsin hazardous waste storage license. Tulip failed to apply for such a license. Tulip's failure to apply for and obtain a hazardous waste storage license violated the requirements of Wis. Admin. Code §§ NR 680.30, 680.31, and 680.32 [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a license exemption condition incorporated from Wis. Admin. Code ch. NR 665 is also an independent violation of the corresponding TSDF requirement.

WASTE DETERMINATION, MANIFEST, AND USED OIL VIOLATIONS

7. Hazardous Waste Determination

Under Wis. Admin. Code § NR 662.011[40 C.F.R. § 262.11], a generator must determine whether its waste is hazardous. A generator must keep records of any test results, waste analyses, or other determinations made in accordance with Wis. Admin. Code § NR 662.011[40 C.F.R. § 262.11]. See, Wis. Admin Code § NR 662.040(3) [40 C.F.R. § 262.40(c)].

At the time of the inspection, Tulip did not provide waste determination documentation for the following wastes generated at the facility:

- Filters that are attached to the oil/water separator, which are used to collect solids in the influent used oil;
- Excess wastewater that is removed from the site by Crystal Clean;
- Spray booth filters;
- Brown liquid material in an open can that was labeled as "Isopropanol" and was described as waste during the inspection in the Old Boiler Room; and,
- Residual clean-up from a spill of tetrachloroethylene-based coating beneath the spray booth.

8. Hazardous Waste Manifests

Under Wis. Admin. Code § NR 662.020 [40 C.F.R. § 262.20], a generator who transports, or offers for transport, a hazardous waste for offsite treatment, storage or disposal, must prepare a Manifest on EPA Form 8700-22.

Tulip generates lead-contaminated wastes including knit gloves, rags, respirator cartridges, and filter bags and ships these combined wastes off-site to a lead smelter. Tulip has not prepared hazardous waste manifests for these lead-contaminated wastes. Tulip has managed these materials as "exempt" wastes under Appendix XI of 40 C.F.R. Part 266. The title of the appendix is *Lead-Bearing Materials That May Be Processed in Exempt Lead Smelters*. This appendix applies only to certain smelters, melters, and refining furnaces which are conditionally exempt from regulation under 40 C.F.R. Subpart H. See, 40 C.F.R. § 266.100(d). This exemption does not apply either to generators or transporters of these materials prior to burning. See, 40 C.F.R. § 266.101(a) and (b).

9. Used Oil Requirement

Under Wis. Admin. Code § NR 679.22(1) [40 C.F.R. § 279.22(a)], a generator of used oil shall not store used oil in units other than tanks, containers, or units subject to regulation under Wis. Admin. Code chs. NR 664 or 665 [40 C.F.R. Parts 264 or 265] of this chapter.

At the time of the inspection, used oil had spilled out into a large puddle on the floor of the Old Boiler Room. Therefore, the oil was not being stored in the proper units as noted above.

CONCLUSION

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with each of the eight (8) above conditions and requirements. You should submit your response to Brenda Whitney U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Ms. Whitney, of my staff, at 312-353-4796 or at whitney.brenda@epa.gov.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Dolores Hayden, WDNR - Dolores.Hayden@wisconsin.gov
Michael Ellenbecker, WDNR - Michael.Ellenbecker@wisconsin.gov

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

Compliance Evaluation Inspection Report

Date of Inspection:	March 20, 2015
Facility Name:	Tulip Corporation
Facility Address:	714 East Keefe Avenue Milwaukee, Wisconsin 53212
EPA RCRA ID Number:	WID006113013
Generator Status:	Small Quantity Generator
Facility Contact:	George Koleas – Human Resources Director
U.S. EPA RCRA Inspector:	Brenda Whitney - Environmental Engineer Compliance Section 2 RCRA Branch Land and Chemicals Division

Prepared By: Brenda Whitney – Environmental Engineer — Date: 9-17-15

Approved By: Julie Morris – Chief, Compliance Section 2 — Date: 9/21/15

Purpose of Inspection

I conducted an unannounced Compliance Evaluation Inspection (CEI or "Inspection") of the Tulip Corporation ("Tulip" or "Facility") located in Milwaukee, Wisconsin, on March 20, 2015. This CEI was an evaluation of Tulip's compliance with the RCRA hazardous waste regulations codified in the Wisconsin Administrative Code and the Code of Federal Regulations. The Facility has notified as a small quantity generator of hazardous waste generating less than 1,000 kilograms of hazardous waste per month. Dolores Hayden of the WDNR was unable to participate in this CEI.

Participants

George Koleas – Human Resources Director	Tulip
Joey Muhammad – Maintenance Supervisor	Tulip
Terry Evraets – Director of Engineering	Tulip
Brenda Whitney – Environmental Engineer	U.S. EPA

Introduction

I displayed official credentials to the Facility personnel upon arrival at Tulip at approximately 8:30 a.m. I signed the visitor logbook and was introduced to Mr. Muhammad who contacted Mr. Koleas and Mr. Evraets. During an introductory briefing with these facility representatives, I explained that the inspection stemmed in part from a citizen complained received at the Agency. The purpose and logistics of the CEI were delineated and permission for me to take photographs in the Facility was granted by Mr. Koleas.

Site Description

The following information about Tulip is based on the personal observations of the EPA inspector and on representations made during the Inspection by the Facility personnel identified above or within the text.

Tulip was founded in Los Angeles, California in 1976. In 1982, Tulip began its Milwaukee operations in a 125,000 square foot building constructed in 1933 that formerly housed Milwaukee Plastics, Inc. and Gould, Inc. At the time of the Inspection, 120 people were employed at the Facility. A second Tulip facility exists in Niagara Falls, New York.

The processes at this Facility include polypropylene injection molding and cold forming of lead battery terminals for lead-acid batteries. The injection molding begins with plastic pellets that are stored either in outdoor silos or indoors in gaylord boxes, and are vacuumed into one of 21 injection molders to form battery cases. Various colorants are added to the pellets according to customer specifications. The cases are molded under elevated temperature and pressure and the finished products are inspected for quality. Any products that are defective are reground at the facility and reused in the process.

The cold-forming process begins with lead ingots which are melted down into cylindrical billets. The billets are forced through an extruder to draw the lead into a thick wire. The wire is coiled onto spools. The wire is fed into presses which cold form the lead-acid battery terminals.

Depending on customer requirements, the covers of the battery cases may be assembled at this facility with the terminals that are made in the cold-form department. In order for the terminals to adhere to the plastic, a coating consisting of primarily tetrachloroethylene (93-98%) and wood rosin (2-3%) is applied to the terminals. The terminals are placed on a chain-on-edge conveyor

mechanism which is a moving chain spiked with vertical rods that spin. The terminals are attached to these rods and follow the chain through a spray booth where an operator manually sprays the red coating on the part.

A variety of wastes are generated throughout the facility, but mainly from the lead department. Wastes from the lead department include the following: dust and fumes coming off the furnace which are collected in an outdoor baghouse system; dross removed from the surface of the molten lead; floor sweepings; gloves; rags, and filters. Mop water from a riding wet floor scrubber is collected in the machine and then consolidated into 55-gallon drums. These drums are placed on caster trays so they can be wheeled into a drum evaporator located in the "Old Boiler" room. The water evaporates leaving behind a sludge. The drum is wheeled back out onto the floor to be refilled with mop water. The process is repeated until the sludge has filled the container. Each of these wastes, above, are managed as "Materials for Recycle." According to facility representatives, all wastes contaminated with lead are considered by-products exhibiting a characteristic and are sent off-site to lead furnaces for lead recovery. Contaminated uniforms are the exception as they are sent for laundering.

Used oil is another main waste generated at this facility. The majority of this oil is generated from leaks in the cold-form presses as well as the injection molders. The oil from the injection molders collects in pits below each piece of equipment. These pits are graded toward a blind sump, which are vacuumed out into mobile totes. Containment trays around the cold-form presses serve the same purpose and are vacuumed out into the totes as well. The totes are then wheeled into the Old Boiler room for processing in an oil-water separator. The recovered oil is reused throughout the facility. The effluent from the separator collects in a stationary 450-gallon tank and is removed from the site by Crystal Clean. According to Mr. Muhammad, Tulip does not discharge any effluent from this system to the sewer. Also according to Mr. Huhammad, no used oil is sent off site. The filters attached to the oil-water separator capture the sediment that may be present in the waste; therefore, the separator itself has never been cleaned out. It was not determined at the time of the inspection how the spent oil filters are managed.

Wastewater is generated on-site from non-contact cooling waters for heat exchangers. Before discharge to the sewer, the water is treated with Ridlime, a corrosive chemical, and tri-sodium phosphate, a neutralizing agent, both of which are automatically metered into the system. The Facility maintains a general industrial wastewater permit through the Milwaukee Metropolitan Sewerage District.

Other wastes generated at the facility include spent sulfuric acid from the laboratory, filters from the spray booth, aerosol can waste, universal waste, electronic waste, and parts washer solvents.

Site Tour

The tour began at the south end of the facility in the lead department. Green poly drums were located in several areas and were used for collecting used aerosol cans. These containers would be collected for puncturing in a loading dock on the north side of the facility warehouse. Around one of the cold-form presses, I noted an example of a partially-filled oil containment tray, which would be vacuumed out into a tote and processed in the oil-water separator.

I observed the lead furnace area. The ingots are stacked for loading by forklift into the furnace. Additional left-over bits of metal knock-off are loaded into a hopper and fed into the furnace as well. A few drums were positioned around the machine for dross, gloves, rags, and other miscellaneous lead-contaminated wastes. The drums were labeled as "Materials for Recycle" and with other words describing their contents. Containers for dross were open for venting heat. Containers of lead-contaminated wastes were closed. The baghouse which captures fumes from the molten lead was outside the facility. A drum beneath the baghouse cone had a faded "Materials for Recycle" label.

East of the furnace area and north of the cold-form presses were several containers of waste materials. Each of the containers was closed at the time of the CEI. An employee in the area was able to open the containers for further inspection. Upon seeing the labels on the containers as well as the drum contents, Mr. Evraets went to the office to retrieve Tulip's operating procedure manual for labeling waste. The contents of many of the containers did not match the labels that were affixed to them, if they were labeled. According to the operating procedure, each of these containers held recyclable materials and should have been labeled only as "Materials for Recycle." The exception is the tote of used oil, which was labeled as "Used Oil." See the chart below.

Container Number	Container Size (gal)	Label or Marking	Second Label or Marking	Other visual description
1	30	No label	N/A	Lead dross
2	30	No label	N/A	Lead dross
3	55	Materials for Recycle	Lead Filter Bags	Filter bags
4	55	Materials for Recycle	Lead Filter Bags	Filter bags
5	55	No label	N/A	Filter bags
6	55	Hazardous Waste		Lead-contaminated wastes (e.g., gloves and filter bags)
7	55	Hazardous Waste	N/A	Lead-contaminated wastes
8	55	Hazardous Waste	N/A	Lead-contaminated wastes
9	55	Hazardous Waste	N/A	Lead-contaminated wastes
10	55	Hazardous Waste	N/A	Lead dross
11	55	Materials for Recycle	Lead Filter Bags	Filter bags
12	55	No label	N/A	Lead-contaminated wastes
13	450	Used Oil	N/A	N/A

Three additional drums were observed near this container storage area. These 55-gallon drums were each labeled as "Waste Water for Evaporation" and were staged on caster trays. Mr. Muhammad explained that the drums, which contained spent mop water and sediment build-up, would be wheeled into the drum evaporator in the Old Boiler room to reduce the volume of the waste. The sludge in the bottom would eventually be sent off-site for recycling.

The tour continued to the Old Boiler room located at the south end of the facility. This room, no longer a boiler room, is used mostly as storage for parts, used oil and universal waste. Walking into the room, we stood on an elevated platform. On this platform were two totes that are used to store the oily water vacuumed from the presses and molding machines. One tote was labeled as "Used Oil." The second tote was labeled as "Water + Hyd Oil." Also on this platform were containers of universal waste. I observed one 4-foot container and one 8-foot container of used lamps. The containers were closed and labeled as "Used Light Bulbs" and "Used Fluorescent Lamps," respectively. The 8-foot container was also marked with a start date of accumulation, though the year was not legible.

The floor of the room is a few steps down from the platform. The oil water separator is on this level and was labeled as "Used Oil." I observed the filter casings which are attached to the separator and are used to capture the sediment prior to the oil entering the separator. A 450-gallon tank used to collect the effluent from the separator was also labeled as "Used Oil." According to records, Crystal Clean manages this material as an oily water, not as used oil. A 30-gallon drum of used oil was observed near the storage racks. The container was not labeled. I observed the remnants of a spill of oil in the northeast side of the room. Mr. Muhammad stated that the spill occurred in the previous shift and they had not had time to clean it up. Also in this area near the spill, I observed a one-gallon container of isopropyl alcohol that was open and appeared to be unusable. Mr. Muhammad stated that it would not be used and it was a waste.

Two drains to the sewer were observed in this room. One drain was surrounded by a 4-inch concrete curb to prevent a spill from reaching it. The second drain was in the middle of a mound of concrete that raised the opening approximately 3 to 4 inches. According to Mr. Koleas, if all of the containers of oil in the room were to fail, the floor of the room would contain the spill. At the time of the CEI, a brown hose was positioned over the second drain. I could not ascertain to what this hose was connected. Mr. Muhammad stated that nothing in this room is directly discharged to the sewer.

Immediately outside of the room, I noticed a 55-gallon poly drum of raw material labeled as "Tetrachloroethylene" and was told by Mr. Koleas that this material is used in the spray booth on the lead terminals for adhesion to the battery cases. The spray booth is located on the far north end of the facility. Prior to reaching the booth, I observed the injection molders. Hazardous waste did not appear to be generated in this area. Mr. Koleas pointed out the pits and sumps beneath the machines that collect leaked oil and water. I asked why so much liquid escaped the equipment. Mr. Koleas believes that they are designed in this fashion and pointed out a one-year old machine that had just as much leakage as the older machines. In addition, the cooling system on the equipment uses an oil/water mixture. If a cooling hose pops loose, several gallons of oil and water may be added to the leak.

The spray booth was not in operation at the time of the inspection. I observed a spill of the red coating on the floor. An employee had poured a citrus-based solvent on the spill in order to loosen it, as it had dried to the floor. I stated to Mr. Koleas and Mr. Evraets that the spill clean-up would need to be characterized. I observed the spray booth, which is approximately 64 to 125 square feet in size and is lined with filters. These filters are discarded in the general trash. A partswasher near the booth is used to clean the guns and lines. The solvent used in the

partswasher is citrus-based (limonene) and has a flash point of 124°F, according to the MSDS. The drum of coating is positioned on its side in a spill cart with the dispenser tap in a bunghole. Drips are caught in the spill cart.

The tour progressed to the east side of the facility which is mostly warehouse. In the northeast corner of this area, I observed the aerosol can-puncturing mechanism atop a 55-gallon drum. The drum was labeled as "Hazardous Waste" and was closed.

On the way back to the conference room, I observed the maintenance area near the injection molding department and the facility tool room. I did not observe hazardous waste in either area. I also toured the facility laboratory. Sulfuric acid is used in this laboratory to test batteries. A 55-gallon drum of spent acid was in the lab. The container was closed and labeled as "Hazardous Waste." The final area visited on the tour was the water treatment system for non-contact wastewaters generated from cooling heat exchangers. I observed containers of Ridlime and tri-sodium phosphate. Hazardous waste was not observed in this area.

End of Tour

Records and Emergency Preparedness Review

Preparedness and Prevention: Three employees have been designated as emergency coordinators: George Koleas, Terry Evraets, and Joey Muhammad. Near a phone, they have posted a phone directory which includes the emergency number for the fire department as well as an emergency coordinator's phone number. They have also posted evacuation maps. These postings do not include the location of fire extinguishers, spill control material, and fire alarm. The facility is equipped with telephones and emergency response equipment including sprinklers, fire extinguishers, and spill kits. Aisle space appeared adequate in the work areas; however, the storage area for recyclable materials did not have aisles which made reading or finding labels on the containers difficult.

Manifests: Manifests for three years were available for review. Two manifests dated from 7/10/14 and 7/11/14 showed shipments of D001 hazardous waste described as isoparaffinic hydrocarbons and contaminated used oil to Crystal Clean. This waste stream was not identified during the inspection. Also, during the inspection, only one partswasher was identified. The manifests show two different types of partswasher solvent going off site as either non-RCRA waste or as D008 hazardous waste. Mr. Koleas was not sure where the second partswasher was located or which one would have been hazardous. Land disposal restriction forms were available. For the shipments of contaminated used oil in July, 2014, the LDR noted that UHCs were applicable, but did not list any.

Training: Tulip provides an education program for waste handling and safety procedures which covers hazardous waste and their emergency action plan.

Waste Determinations: According the information gathered during the inspection, all waste determinations have been made. The accuracy of the determinations will be further discussed with Tulip's environmental consultant, Mr. Dan Askin.

Weekly Inspections: Hazardous waste was not being stored in a 180-day storage area. According to facility representatives, Tulip does not maintain a regular hazardous waste storage area.

Closing Conference

During the closing conference with the Mr. Koleas, I discussed my observations noted during the inspection and asked some outstanding questions from the inspection checklists. Mr. Koleas provided me with Tulip's third-party environmental consultant's information so that I could contact him with additional questions and clarifications. I informed Mr. Koleas that I would be generating a report that included a letter, narrative discussion of the CEI and attendant photographs and checklists. Any response needed from Tulip according to the letter would be expected within 30 days. I provided three informational handouts: *SHWEC Environmental Programs (WDNR brochure); P2 Technical Assistance Contacts; and U.S. EPA Small Business Resources.*

The following items were discussed with Mr. Koleas at the close of the inspection.

- Wastes generated from partswashers;
- Management of wastes contaminated with tetrachloroethylene generated from the spray booth.
- Contracts for lead reclamation and laundering;
- Universal waste storage times;
- Information discussed and collected throughout the inspection was not claimed as confidential business information.

Appendices

Appendix A: Photograph Log
Appendix B: WDNR Small Quantity Generator Checklist
Appendix C: Documents received during the CEI
Appendix D: Post-Inspection Informational Exchange Documentation

Post-Inspection Note:

According to facility environmental consultant, Daniel Askin of Esca Tech, Inc, the wastes generated at the Tulip facility fall into the following categories and are not solid wastes:

- Byproducts exhibiting a characteristic that are to be recycled: lead dross;
- Excluded Scrap metal: lead punch-outs, shavings;
- Sludge exhibiting a characteristic that is to be recycled: baghouse dust and filters; and
- Exempt Lead-bearing waste streams per Appendix XI of 40 CFR part 266 – Floor sweepings (mop water), rags, gloves, and respirator components.

Appendix A

Photograph Log

Inspection Date:
March 20, 2015

Facility Name and ID Number:
Tulip Corporation
EPA ID: WID006113013

Inspector and Photographer:
Brenda Whitney
Compliance Section 2
RCRA Branch
Land and Chemicals Division

Camera Used:
Olympus Stylus 600
Serial Number: A47525904

Photograph 1 – This drum was situated near the lead melter and was labeled as "Materials for Recycle." This type of label indicates a lead-contaminated waste that will be sent to a smelter.

Photograph 2 – A 450-gallon tote of used oil was located in a waste storage area north of the cold-form presses. The tote was labeled as "Used Oil."

Photograph 3 – Several drums of waste were staged in the waste storage area. Four of these containers were labeled as "Hazardous Waste." They contained lead-contaminated wastes. Two of these containers were not labeled and held lead dross.

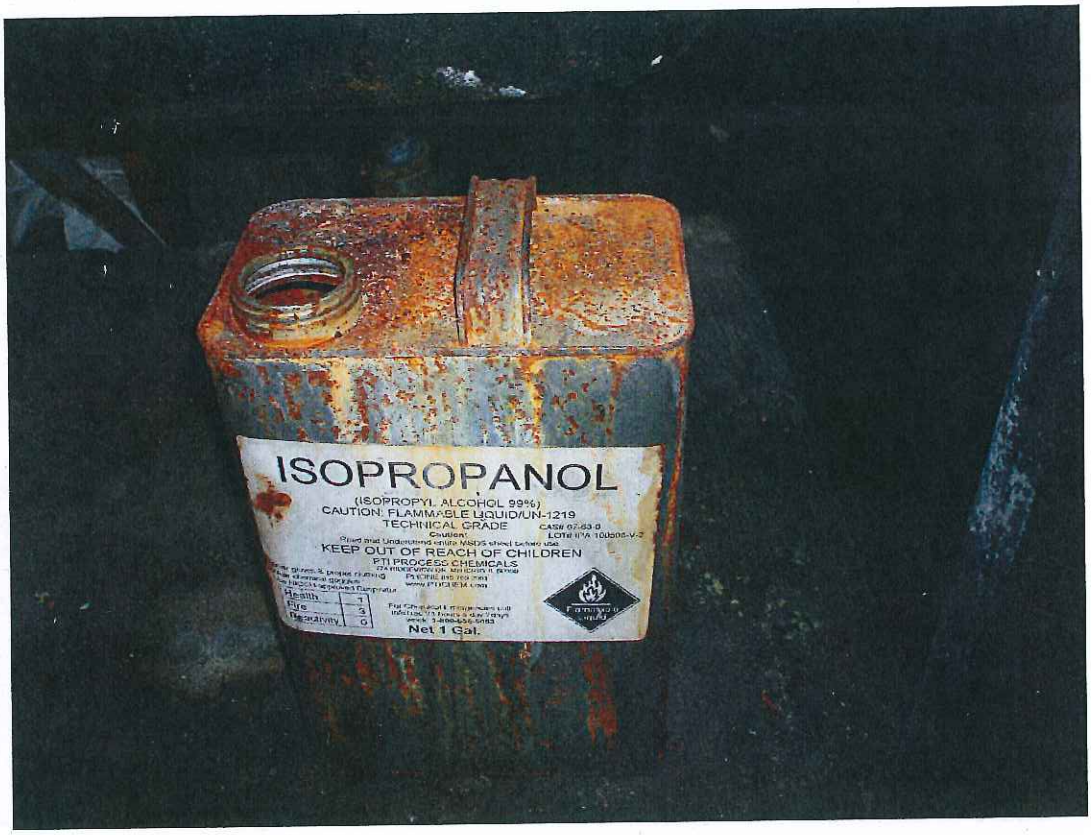
Photograph 4 – This photograph shows additional containers in the storage area identified in Photograph 3, above. Each of the containers held lead-contaminated wastes.

Photograph 5 – These two 55-gallon drums held mop water and lead-sludge that was to be evaporated in the drum evaporator. The containers were labeled as "Waste Water Ready for Evaporation."

Photograph 6 – A 450-gallon vacuum cart located in the "Old Boiler Room" was labeled as "Water + Hyd Oil." The container held used oil and water.

Photograph 7 – This photograph is oriented on its left side. Two containers of universal waste lamps were kept in the Old Boiler Room. One container was labeled as "Used Fluorescent Lamps." The second container was labeled as "Used Bulbs." Both containers were closed.

Photograph 8 – On the floor of the Old Boiler Room was an oil spill that had occurred the previous shift.



Photograph 9 – A one-gallon can of isopropanol was on a cart in the Old Boiler Room. The material inside the container was rusty brown. The container was open.

Photograph 10 – A 30-gallon drum in the Old Boiler Room contained used oil. The container was not labeled.

Photograph 11 – Beneath the spray booth, a spill of the tetrachloroethylene-based wood resin was dried to the floor. An employee poured citrus-based solvent on the spill to loosen it for disposal.

Photograph 12 – This photograph shows the inside of the spray booth. The filters shown are discarded as non-hazardous waste.

Appendix B

Checklists

Inspection Date:
March 20, 2015

Facility Name and ID Number:
Tulip Corporation
WID006113013

Inspector:
Brenda Whitney
Compliance Section 2
RCRA Branch
Land and Chemicals Division

SMALL QUANTITY GENERATOR INSPECTION

Revision: 10/31/2011
WASTE & MATERIALS MANAGEMENT PROGRAM

This Inspection Form, used for the inspection of facilities that generate between 100 kg (220 lbs) and 1000 kg (2205 lbs) of non acute hazardous waste in a calendar month and less than 1 kg of acute hazardous waste in a calendar month , evaluates facility compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 660 - 679, Wis. Admin. Code).

Section 1: Waste Information

A. Hazardous waste determination has been made on each solid waste generated (NR 662.011).	Y	662.190(2) Photo☐
B. The waste determination has been made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used (NR 662.011(3)). (Accuracy to be determined post-inspection)	ND	662.190(2) Photo☐
C. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers (NR 662.011(3)(a)1). GEN KNOWLEDGE	Y	662.190(2) Photo☐
D. Generator keeps records of all waste determinations on-site for at least three years from the date the waste was last sent to a storage, treatment or disposal facility.	Y	662.193(1)(b) Photo☐
E. Generator submitted a notification form and obtained an EPA ID# (NR 662.012). Note: A subsequent notification should be submitted when there is an ownership or name change.	Y	662.190(2) Photo☐

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

A. Generator sends waste off-site to be reclaimed under a contractual agreement. If NO, go to Question 2.E.	NO	Photo☐
B. Type of waste and frequency of shipments are specified in the contractual agreement. LEAD RECLAMATION (DROSS & CONTAMINATED WASTE)	N/A	662.191(1)(a) Photo☐
C. Vehicle used to transport the waste to the recycler and back to the generator is owned and operated by the reclaimer. → They do not get the reclaimed lead back	N/A	662.191(1)(b) Photo☐
D. Copy of the reclamation agreement is maintained for at least 3 years from the date the agreement is terminated or expires.	N/A	662.191(2) Photo☐
E. Generator sends hazardous waste off-site that is not reclaimed under a contractual agreement. If NO, go to Question 2.K.	Y	Photo☐
F. The manifest is used according to the instructions in the appendix to 40 CFR part 262 (NR 662.020(1).	Y	662.190(2)(a) Photo☐
G. The facility designated on the manifest is permitted or licensed to accept the waste (NR662.020(2)).	Y	662.190(2)(a) Photo☐
H. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility (NR 662.023(3)).		662.190(2)(a) Photo☐
I. Manifest continuation form, EPA form 8700-22A, is prepared according to the instructions in the appendix of 40 CFR part 262 (NR 662.020(1)).	Y	662.190(2)(a) Photo☐
J. If the generator received a shipment back as a rejected load, the returned waste has been accumulated in compliance with the container or tank standards for less than 180 days.	N/A	662.192(5) Photo☐

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

K. Upon receipt of the rejected shipment, the generator signed EITHER of the following: 1. Manifest Item 18c if the transporter returned the shipment using the original manifest. 2. Manifest Item 20 if the transporter returned the shipment using a new manifest.	N/A	662.192(5) Photo☐
L. Copy of the manifest is signed by the generator and retained until the signed copy from the designated facility is received.	Y	662.193(1)(a) Photo☐
M. Copy of each manifest is kept for at least three years from the date of shipment.	Y	662.193(1)(a) Photo☐
N. Hazardous waste is packaged according to applicable DOT requirements before transport (NR 662.030). DID NOT OBSERVE		662.190.(2) Photo☐
O. Hazardous waste is labeled according to applicable DOT requirements before transport (NR 662.031). DID NOT OBSERVE		662.190(2) Photo☐
P. Hazardous waste is marked according to applicable DOT requirements before transport (NR 662.032(1)). DID NOT OBSERVE		662.190(2) Photo☐
Q. Containers of 119 gallons and less are marked with the "Hazardous Waste - Federal law prohibit improper disposal" label before transport (NR 662.032(2)). DID NOT OBSERVE		662.190(2) Photo☐
R. Placards are offered to the initial transporter (NR 662.033). DO NOT SHIP WITHOUT PLACARDS	N/A	662.190(2) Photo☐

Section 3: Land Disposal Restrictions

A. Generator determined if each waste is prohibited from land disposal by lab analysis or generator knowledge.	Y	668.07(1) Photo☐
B. Generator complies with the prohibition against dilution of wastes.	Y	668.03 Photo☐
C.A one-time written notice is sent to each treatment, storage or disposal facility with the initial waste shipment.	Y	668.07(1) Photo☐
D. A new notification is sent to the TSD and maintained in the generator file when the waste or receiving facility changes.	N/A	668.07(1) Photo☐
E. If the waste MEETS treatment standards, the LDR notice certifies the wastes may be land disposed without further treatment.	N/A	668.07(1) Photo☐
F. If the waste EXCEEDS treatment standards, the LDR notice notifies of appropriate treatment and applicable prohibitions.	Y	668.07(1) Photo☐
G. Copy of the LDR notifications and certifications are retained for at least 3 years from the date the waste was last sent off-site.	Y	668.07(1)(h) Photo☐

Section 3: Land Disposal Restrictions

H. Generator with a contractual agreement complies with BOTH of the following: 1. The notification and certification requirements for the initial shipment of the waste subject to the agreement. 2. Retains a copy of the notification and certification with the tolling agreement for at least 3 years after the agreement is terminated or expires.	N/A	668.07(1)(j) Photo☐
I. Underlying hazardous constituents have been identified for characteristic wastes.	N	668.09(1) Photo☐
J. Generator identifies EITHER of the following when the waste is both a listed and characteristic waste: 1. The treatment standards for the listed waste code, in lieu of the treatment standard for the characteristic waste code. 2. The treatment standards for all applicable listed and characteristic waste codes.	N/A	668.09(2) Photo☐
K. If waste is treated in containers or tanks, the generator meets with BOTH of the following (NR 668.07(1)(e)): 1. Developed a waste analysis plan describing the procedures used to meet applicable LDR treatment standards. 2. Complies with the certification requirements in NR 668.07(1)(c).	N/A	662.192(1)(d) Photo☐

Section 4: Annual Reports and Exception Reporting

A. Annual reports covering generator activities during the previous calendar year have been submitted to the Department by March 1 of the following year.	Y	662.193(3) Photo☐
B. Copy of each annual report is kept for at least 3 years from the due date of the report.	Y	662.193(1)(c) Photo☐
C. If the signed manifest copy is not received in 60 days, a legible copy of the manifest indicating no confirmation of delivery was submitted to the department.	N/A	662.193(2) Photo☐

Section 5: Preparedness and Prevention

A. Generator has ALL of the following equipment, unless the equipment is not necessary for the types of wastes handled (665.0032): 1. Device to summon emergency assistance (e.g., telephone, 2 way radio). 2. Internal communications and alarm systems. 3. Portable fire extinguishers. 4. Fire control equipment, including special extinguishing equipment. 5. Spill control equipment. 6. Decontamination equipment (e.g., eyewash, shower). 7. Water at adequate volume and pressure to supply water spray systems.	Y	662.192(1)(d) Photo☐
B. All of the above emergency equipment is tested and maintained to assure its proper operation in an emergency (665.0033).	Y	662.192(1)(d) Photo☐
C. There is immediate access to internal or external alarms or an emergency communication device in hazardous waste handling areas (665.0034).	Y	662.192(1)(d) Photo☐

Section 5: Preparedness and Prevention

D. Generator has made ALL of the following arrangements with emergency organizations (NR 665.0037(1)): 1. Primary and support roles have been defined if multiple police and fire departments could respond to an emergency. 2. Police, fire and emergency response teams are familiar with the site layout, hazards of the waste handled, places where personnel work, entrances and roads in the site and possible evacuation routes. 3. Agreements are made with emergency response contractors and equipment suppliers. 4. Local hospitals are familiar with the properties of wastes handled and the potential resulting injuries or illnesses.	Y	662.192(1)(d) Photo☐
E. Aisle space is provided throughout the facility to allow for the unobstructed movement of personnel and all emergency equipment (NR 665.0035).	N	662.192(1)(d) Photo☐

TIGHT IN DRUM STORAGE AREA FOR CONTAMINATED WASTES.

Section 6: Emergency Procedures & Personnel Training Requirements

A. A person has been identified as an emergency coordinator who is responsible for coordinating all emergency response measures and is on the premises or able to reach the site within a short period of time.	Y	662.192(1)(e)1 Photo☐
B. ALL of the following information is posted next to the telephone: 1. Name and telephone number of the emergency coordinator. 2. Location of fire extinguishers, spill control material and, if present, fire alarm. 3. Telephone number of the fire department unless the generator has a direct alarm.	N	662.192(1)(e)2 Photo☐
C. In the event of an emergency, the emergency coordinator takes the following actions: 1. In the event of a release, telephone the division of emergency management (800-943-0003) and comply with NR 706. 2. In the event of a fire, call the fire department or attempt to extinguish the fire, if appropriate. 3. In the event of a spill, contain the flow of hazardous waste to the extent possible and clean up the hazardous waste and contaminated materials or soil. 4. If there is a release that could threaten human health outside the facility or if a spill reaches surface water, immediately notify the national response center (800-424-8802).	Y	662.192(1)(e)4 Photo☐
D. All employees are thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities during normal operations and emergencies.	Y	662.192(1)(e)3 Photo☐

Section 7: Container Accumulation

According to facility personnel during CEI

A. Generator accumulates hazardous waste in containers. If NO, go to Section 8.	NO	Photo☐
B. The accumulation start date is clearly marked and visible for inspection on each container.	N/A	662.192(1)(d)1 Photo☐
C. All containers are clearly marked with the words "Hazardous Waste".	N/A	662.192(1)(d)2 Photo☐
D. The contents of a container that is leaking or in poor condition are transferred to another container in good condition (NR 665.0171).	N/A	662.192(1)(b) Photo☐

Section 7: Container Accumulation

E. Containers are made or lined with materials compatible with the waste (NR 665.0172).	N/A	662.192(1)(b) Photo☐
F. Containers are kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	N/A	662.192(1)(b) Photo☐
G. Containers are opened, handled or stored to prevent leaks or ruptures (NR 665.0173(2)).	N/A	662.192(1)(b) Photo☐
H. Container storage areas are inspected weekly for leaks and deterioration (NR 665.0174).	N/A	662.192(1)(b) Photo☐
I. Incompatible wastes are stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(1)).	N/A	662.192(1)(b) Photo☐
J. Containers of incompatible wastes are separated or protected from each other by a physical barrier (dike, berm, wall or other device) (NR 665.0177(3)).	N/A	662.192(1)(b) Photo☐
K. Containers that previously held waste are properly washed before adding incompatible waste, unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(2)).	N/A	662.192(1)(b) Photo☐

Section 8: Satellite Accumulation

A. Waste is accumulated in satellite accumulation areas. If NO, go to Section 9.	Yes	Photo☐
B. Generator accumulates no more than 55 gallons of hazardous waste or 1 quart of acute hazardous waste in each satellite area.	N	662.192(4)(a) Photo☐
C. Satellite containers are under the control of the operator of the process generating the waste.	Y	662.192(4)(a) Photo☐
D. Containers are always kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	Y	662.192(4)(a)1 Photo☐
E. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	Y	662.192(4)(a)1 Photo☐
F. Containers are marked "Hazardous Waste" or with other words that identify the contents.	Y	662.192(4)(a)2 Photo☐
G. If the container is leaking or in poor condition, contents are transferred to another container in good condition (NR 665.0171).	N/A	662.192(4)(a)1 Photo☐
H. Container holding the excess waste is marked with the date the excess amount begins accumulating.	N/A	662.192(4)(b) Photo☐

SMALL QUANTITY GENERATOR INSPECTION

Section 8: Satellite Accumulation

I. Generator complies with the 180 day accumulation requirements with respect to the excess amount within 3 days of it being generated. Company said	Y	662.192(4)(b) Photo☐

Section 9: Used Oil

A. Used oil is managed on-site. If NO, go to Section 10.	Y	Photo☐
B. Used oil containing >= 1,000 ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met. No Record of TX found during CEI	ND	679.10(2)(a)2 Photo☐
C. Used oil containers and tanks are in good condition and not leaking.	Y	679.22(2) Photo☐
D. Used oil containers and tanks are marked "used oil".	N	679.22(3)(a) Photo☐
E. Transporter has an EPA ID number, except when generator self-transports or has a tolling agreement.	Y	679.24 Photo☐
F. Used automotive oil filters and oil absorbent material are not land filled, except if less than 1 gallon absorbent results from a non-routine spill.	Y	Photo☐
G. If used oil is burned in an on-site used oil-fired space heater, all of the following are met: 1. Only used oil from the generator or household do-it-yourselfers is burned. 2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less. 3. The combustion gases are vented to the ambient air.	N/A	679.23 Photo☐
H. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.	N/A	679.11 Photo☐

Section 10: Waste Minimization Certification

A. Small quantity generator has made a good faith effort to minimize the amount of waste generated (NR 662.027(2)).	Y	662.190(2)(a) Photo☐

Section 11: Generator Status Evaluation

A. Between 220 lbs (100 kg) and 2,205 lbs (1,000 kg) of waste is generated in any month.	Y	662.190(1) Photo☐
B. Waste is accumulated for 180 days or less.	Y	662.192(1) Photo☐
C. Waste is accumulated for 270 days or less if the generator must ship 200 miles or more.	N/A	662.192(2) Photo☐

Section 11: Generator Status Evaluation

D. Less than 13,230 lbs (6,000 kg) of waste is accumulated.	Y	662.192(1)(a)	Photo ☐
E. Describe any other activities the generator is conducting at the facility.			Photo ☐

UNIVERSAL WASTE HANDLER INSPECTION REPORT - SMALL QUANITY HANDLER

Revision: 03/27/2012
WASTE & MATERIALS MANAGEMENT PROGRAM

This Inspection Form, used for the inspection of facilities that generate or handle less than 5000 kg of universal waste (hazardous waste batteries, pesticide, lamps, antifreeze, and some mercury containing devices), evaluates facility compliance with Wisconsin's Hazardous Waste Management Rules (chapters NR 660-679, Wis. Admin. Code). The Universal waste regulations streamline the requirements for hazardous waste batteries, pesticide, lamps, antifreeze, and some mercury containing devices. Persons treating, disposing, recycling, or otherwise processing universal wastes are subject to applicable hazardous waste regulations.

Section 1: Prohibitions

A. Universal waste is not disposed on-site.	N	673.11(1) Photo☐
B. Universal waste is not diluted or treated on-site. Note: Dilution or treatment does not include: sorting, mixing, discharging, regenerating, or disassembling batteries; removing batteries from consumer products or removing electrolytes; removing thermostat ampules; or, responding to a release of universal waste.	N	673.11(2) Photo☐

Section 2: General Standards

A. Universal waste batteries and thermostats that are broken or show evidence of leakage or spillage are placed in closed, structurally sound containers that are compatible with the waste and are not leaking.	N/A	673.13 Photo☐
B. Universal waste pesticides and lamps are placed in closed, structurally sound containers that are compatible with the waste and not leaking.	Y	673.13 Photo☐
C. Sorting, mixing or handling of batteries is only conducted if the battery casing is not breached and remains intact.	Y	673.13(1)(b) Photo☐
D. Wastes generated by handling or cleaning up spills of universal wastes are managed according to hazardous waste or solid waste rules.	N/A	673.13 Photo☐
E. If mercury containing ampules are removed from thermostats, the handler meets ALL of the following: 1. Ampules are removed in a manner to prevent breakage. 2. Removal is conducted over a containment device. 3. Spills or leaks are immediately cleaned up. 4. Activity is performed in a well ventilated, monitored environment.	N/A	673.13(3)(b) Photo☐
F. Pesticides are placed in a tank that meets NR 665 subch. J requirements, except closure and post closure requirements in NR 665.0197(3) and waste analysis requirements in NR 665.0200.	N/A	673.13(2) Photo☐
G. Pesticides are placed in a transport vehicle or vessel that is closed, structurally sound, not leaking and compatible with the waste.	N/A	673.13(2) Photo☐
H. All universal wastes are labeled or marked "Waste" or "Used" followed by the specific type of universal waste handled or "Universal Waste".	Y	673.14 Photo☐
I. Containers, tanks, or transport vehicles of recalled pesticides are additionally marked with the label that was on or accompanied the product when it was sold or distributed.	N/A	673.14 Photo☐
J. Length of accumulation time is demonstrated by any of the following: 1. Mark or label each container with the earliest date the waste is generated or received. 2. Mark or label the individual item of waste with the date it was generated or received. 3. Maintain an inventory system identifying the date the waste was generated or received. 4. Place the universal waste in a specific accumulation area identified with the earliest date the waste was generated or received. 5. Use some other method that clearly demonstrates the length of accumulation time.	Y	673.15(3) Photo☐ shipping date
K. Universal waste is accumulated for less than one year from the date generated or received from another handler.	N	673.15(1) Photo☐

Code/Stat ? : C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected
Noncode ? : Y: Yes N: No UN: Unknown
Notes : *: Dept. approved alternate may apply No 'box' is an open ended question

Section 2: General Standards

L. If universal waste is accumulated beyond one year, the handler can prove that accumulation was necessary to facilitate proper recovery, treatment or disposal.	N	673.15(2) Photo☐
M. Employees are trained on the proper handling and emergency procedures appropriate to the types of waste handled at the facility.	N	673.16 Photo☐
N. Handler complies with ALL of the following when a release occurs: 1. Immediately contains the release. 2. Determines if the spill residue is hazardous waste. NONE OBSERVED 3. If hazardous waste, disposes of it as such.	N/A	673.17 Photo☐

Section 3: Off-site Shipments

A. Handler sends the waste to a destination facility, foreign destination or another handler.	Y	673.18(1) Photo☐
B. Handler that self-transports complies with ALL of the following: 1. Applicable US DOT regulations in 49 CFR parts 171 to 180 when transporting universal waste that meets the definition of hazardous materials. 2. Immediately contain release and make waste determination on spill residue. 3. If shipped to a foreign destination other than an OECD country, use an EPA acknowledgement of consent.	N/A	673.18(2) Photo☐
C. For hazardous materials, the handler packages, labels, marks, placards and prepares the proper shipping papers in accordance with DOT requirements in 49 CFR parts 172 to 180.	Y	673.18(3) Photo☐
D. When shipping to another universal waste handler, the handler has agreed to receive the shipment.	N/A	673.18(4) Photo☐
E. If a shipment was rejected, EITHER of the following occurred: 1. The waste was sent back to the originating handler. 2. The originating handler agreed on a destination facility to which to ship the waste.	N/A	673.18 Photo☐
F. If a shipment contains hazardous waste, the handler receiving the shipment immediately notifies the Department.	N/A	673.18(7) Photo☐
G. Nonhazardous, nonuniversal waste, in a universal waste shipment is managed in compliance with the solid waste requirements.	N/A	673.18(8) Photo☐

Appendix C

Documents received during the Inspection:

- Emergency Action Plan
- Evacuation Map
- Emergency Posting phone list
- Environmental Education: Handling/Disposal – Waste and Recyclable Items
- Waste Stream 2014 list
- Orange Tough 40 MSDS
- Wedor Part No. P-5001 MSDS
- IH Source, LLC Sampling Report

Inspection Date:
March 20, 2015

Facility Name and ID Number:
Tulip Corporation
EPA ID: WID006113013

Inspector:
Brenda Whitney
Compliance Section 2
RCRA Branch
Land and Chemicals Division

EMERGENCY ACTION PLAN

GENERAL PURPOSE

The purpose of this emergency plan is to minimize the effect of those losses, which may occur in an emergency situation by:

1. Preventing injuries and saving lives.
2. Reducing property damage.
3. Planning for an effective response and an expeditious resumption of operations.

DEFINITIONS

An emergency is defined as:

1. An accident causing fatal or severe injuries
2. Unexpected operational incidents, which may result in fires or explosions
3. Severe weather or forces of nature, such as earthquakes, high winds, snow and floods
4. Deliberate damage from riots, civil disturbances, or plant sabotage

RESPONSIBILITIES

The responsibility for coordination of the emergency response is:
The Human Resources Director, alternate is the maintenance supervisor

1. The person principally assigned a responsibility in this plan is to designate alternatives in case of absence or shift differential, and is to train and inform alternates as to their duties and responsibilities
2. To be successful, an emergency plan must be understood and accepted by all employees.
3.. The all designated personnel, as defined herein, must assure immediate action when an emergency arises.

EMERGENCY PLAN KEY ASSIGNMENTS AND RESPONSIBILITIES

For Tulip Corporation, 714 E. Keefe Ave., Milwaukee, WI 53212

ASSIGNMENT	PHONE and ALTERNATIVES
In Charge of Total Plan	1) (262) 251-7216 George Koleas 2) (262) 388-2215 Site Manager Terry Evraets
Coordinator	1) (262) 251-7216 George Koleas 2) (262) 388-2215 Terry Evraets 3) (414) 217-0656 Joey P. Mohammad
Traffic Control/Vehicular	1) Injection Molding Shift Supervisor(s)
Evacuation	1) Injection Molding Shift Supervisor(s)

Security	1) x244 Mark Whitaker
Maintenance, Repairs Shut Down	1) (414) 217-0656 Joey P. Mohammad 2) (262) 388-2215 Terry Evraets 3) (262) 309-2654 Mark Whitaker
Communications	1) x234 Pat Bera
Power/Electrical	1) (414) 217-0656 Joey P. Mohammad
Medical Aid	1) (262)251-7216 George Koleas
Purchasing	1) (920) 639-4837 Jacob Diers
Public Relations	1) (262)251-7216 George Koleas
Welfare and Safety	1) (262)251-7216 George Koleas
Records	1) x234 Pat Bera
Bomb Threats, Riots, Civil Defense	1)(262)251-7216 George Koleas
Spill Cleanup	1) (414) 217-0656 Joey P. Mohammad 2) (262) 388-2215 Site Manager Terry Evraets
Fire Chief	1) (414) 217-0656 Joey P. Mohammad
Asst. Fire Chief	1) Injection Molding Shift Supervisor(s)
HSM (security)	1) (414) 272-8200
Milwaukee Police	911 or (414) 935-7253 for District 5
Milwaukee Fire Department	911
Milwaukee County Sheriff's Department	911
Columbia/St. Mary's Hospital (ER)	(414) 291-1000
Fire Sprinkler Contractor - Grunau Corp.	(414) 216-6900

ALARM SYSTEM

A The Maintenance Supervisor may delegate the responsibility for initiating emergency plans to one of the following:

1. (262) 388-2215 T. Evraets

B. The Alarm System is:

1. Telephone Paging System
2. Word of Mouth
3. Alarm switch is in the circuit breaker panel in the south /east corner behind K-1
4. Security – HSM – (414) 272-8200

TRAFFIC CONTROL

A. To be directed by the Injection Molding Supervisor on duty when the emergency occurs. This Supervisor will direct all vehicular traffic flow. This is to insure access to the building for emergency vehicles and evacuation of the parking lots, if necessary. Should outside assistance be necessary, he will contact the following, as necessary.

Milwaukee Police	911 or (414) 935-7253 for District 5
Milwaukee Fire Department	911
Milwaukee County Sheriff's Department	911

All personnel vehicles should not be moved unless directed. This will prevent congestion when the emergency equipment tries to enter the premises.

B. Instructions for opening plant gate during emergency situations.

1. Manufacturing Parking Lot Gate (North Side)
   a. This gate is left in the open position until 5:30 p.m. on days the plant is working.
   b. The gate to the employee parking lot will be closed and locked between 5:30 p.m. and 9:30 p.m. and from 10:30 p.m. to 5:30 a.m.
   c. The overhead door will be closed and locked at all times.
   d. All other doors will remain locked at all other times.
   e. If an emergency arises when the plant is not working, the first Key Person who arrives will be responsible for opening the gate
   f. The shift Supervisor will assign an employee to stand outside the door by which emergency personnel should enter and direct them through that door as they arrive.

EVACUATION

A. Should evacuation become necessary, employees are to utilize the nearest exit, go to their assigned assembly point and remain there until released by a member of management. See the attached building layout with exit routes clearly marked. These are also posted throughout the building.

Shift and Department Supervisors will assure that all employees, contractors, contract employees and visitors are accounted for.

Before leaving, they must see that doors are closed and all latches or locks are off in order that the door can be readily opened from either side.

B. Shift and Department Supervisors will notify authorities if any employees are missing and follow the instructions of the authorities.

C. Further directions concerning release or return to work and the like, will be issued by the Shift and Department Supervisor at the appropriate time.

D. All employees are cautioned to use common sense and not to panic. If evacuation is necessary, employees should not stop to gather personal belongings.

E. Evacuation route and assembly area map

Evacuation route(s) and assembly area(s) maps are posted at the locations listed below.

Cafeteria
Bulletin Board
Time Clock
Hallway Outside Human Resources
Accounting

At least two alternate evacuation routes and assembly areas are included. Employees should become familiar with all evacuation route(s) and assembly area(s).

See the Map attached to the Emergency action Plan

G. **Assembly Areas**

EVACUATION OF:	**ASSEMBLY AREAS:**
Office South, first and second floor and Tool Room	Parking lot south of Keefe Ave.
Cold Form, Injection Molding Office North	North parking lot clear of entrance gate
Shipping & Receiving	East side of Fratney Street, at the corner of Keefe Ave.

NOTE: Area Supervisor or a designate by the Supervisor will take attendance of employees, contractors, contract employees and visitors.

PLANT SECURITY

The Maintenance Supervisor is responsible for plant security with support of the supervisors. Only Tulip Corporation staff, employees, approved contractors, and contract employees are allowed in the plant unattended.

The employee entrance from the main employee parking lot must be kept closed and locked at all times. Access is by a security card. Employees must not allow non-employees to use their access card or allow access to the plant.

Employees should report unattended visitors, and suspicious activity that they observe anywhere on or around Tulip Corporation property to their supervisors or a member of management.

A. The Milwaukee Police Department Services will be notified by the maintenance supervisor or a member of management as necessary.
B. Fire Fighting Assistance may be called by the Maintenance Supervisor as necessary:
    1. Fire Department phone number 911
    2. The Fire Chief may call in or request other assistance as necessary.

POWER, WATER, GAS SHUT OFFS

A. The Maintenance Supervisor will direct power and/or water and gas supply cut-off.
B. If required or requested, shut down of all operations, including the manufacturing areas, is to be effected and supervised by the Maintenance Supervisor.

COMMUNICATIONS

A. All outside phone lines run through the switchboard and may be accessed by dialing 9 followed by the number.
    1. The Human Resources Administrative Assistant will coordinate runners from the office for message service to Plant area as required.

PUBLIC RELATIONS

All news of press release information will come from the Human Resources Director.

WELFARE AND SAFETY

A. The accounting for personnel will be the responsibility of respective supervisors. After the emergency, time cards are to be given to the Accounting Department for audit and processing.

B. The Human Resources Director will notify the families of personnel injured at the Plant.

C. The Human Resources Director and the Safety Committee, in coordination with the Maintenance Department, will evaluate existing and possible safety hazards as a result of the incident(s) and document recommendations for prevention of reoccurrence or additional training on equipment required. A written response as to *who, what and when* will be done about the recommendation will be created.

RECORDS

A. The safeguarding of company records is the responsibility of the respective departments. Coordination of this safeguarding will be the Human Resources Administrative Assistant. Priority should be established if evacuation is necessary, of the appropriate company records. As necessary, the records are to be placed in a safe area. (This area will be decided as the emergency is further analyzed and evaluated).
B. Maintenance will assist in moving any records should it be required.

FIRST AID AND MEDICAL EMERGENCIES

We do not have trained first responders. We will rely on calling 911 to get emergency medical assistance or we will utilize existing medical clinics or Hospitals for treatment of injured employees.

The Human Resources Department will provide sufficient emergency First Aid supplies and personnel to utilize supplies until additional professional aid can be secured, as necessary.

First aid kit(s) are available at the following location(s):

- Supervisor's Office in the shop
- Human Resources
- Cold Form Office Hallway leading to Human Resources
- Shipping

A. In the event of a medical emergency that is life threatening or could be life threatening or when moving the person could cause further injury, request medical assistance by calling 911. Remain on the telephone until the operator has all the information. Then go to the location you told the 911 operator and guide the emergency responders to the person with the medical emergency.

1. Have someone stay with the person with the medical emergency to keep them calm and assure them that help is on the way

B. Do not provide medical attention unless you are trained and have the necessary supplies available.

C. If you provide first aid, avoid contact with blood, body fluids or other potentially infectious material by using protective equipment and safe practices. Any exposure must be promptly reported to the employer.

D. If the medical emergency is not life threatening, but the employee needs treatment, complete the Medical Treatment Authorization located on the "S" Drive, "Employee Information" and send the form with the employee. This form includes information about sending an employee for treatment by cab.

- No other employee is sent with an employee needing treatment.

E. Columbia/ St. Mary's Hospital (ER) (414) 291-1000, will be notified of major emergencies.

FIRE EMERGENCY PROCEDURES

A. The purpose of this procedure is to prepare all Plant Personnel for action to be taken in the event that a fire should occur.

B. Fire Alarm
1. Fire water alarm system (at each riser)
2. Telephone system
3. Word of mouth
4. Milwaukee Fire Department (911)

C. Fire Emergency Organization Designated Fire Fighting Employees
1. At the first sign of an incipient fire, the fire alarm will be initiated by the observer. Using the telephone paging system.

NOTE: Incipient Fire: A fire, which has **not** involved the building structure. The Fire Chief or designated leader will determine the class of fire, if necessary.

THERE IS NO EXPECTATION FOR EMPLOYEES TO FIGHT THE FIRE. THE EXPECTATION IS TO REPORT A FIRE SO THAT THE FIRE DEPARTMENT IS CALLED

2. The Maintenance Supervisor (Fire Chief or alternate) will call Milwaukee Fire Department (911) at first occurrence of an incipient fire.
3. Designated employees within a department where the fire is located will assemble. Remainder of employees within the department where the fire is located, will evacuate.
4. Designated employees will fight incipient fire under supervision of area-designated leaders **only if they have been trained to use fire extinguishers.** When it is safe to do so, the Maintenance Supervisor (Fire Chief or alternate) will assign a maintenance employee to be the Sprinkler Control Valve Operator. This person's assignment is to:
    a. Go to the valve that controls sprinklers protecting the fire area to unlock the valve and make sure the valve is open. **The key for the sprinkler locks is in a red box by the cold form time clock.** If it is safe, the sprinkler control valve operator should stand by the valve until it is ordered closed by the Maintenance Supervisor (Fire Chief or alternate) to prevent a premature shutdown.
    b. When the fire has been extinguished, close the valve to prevent further water damage.
    c. Reopen the valve when instructed.
    d. Check to see if there was damage to the valve.
    e. Report and damage to the Maintenance Supervisor.
    f. Lock the valve in the open position.
    g. Return the key for the sprinkler locks to the red box by the cold form time clock.
5. Fire Chief or alternate will evaluate the situation with the Site Manager and either call for additional help, evacuation, or clearance to return to work, when the fire is out

Designated Fire Leaders and Alternates:

Office:	George Koleas
Tool Room	Mark Whitaker
Maintenance	Joey P. Mohammad

Injection Molding Dept. Shift Supervisor(s)
Shipping Jacob Diers

& Receiving
Engineering Mark Sauter

Initial Actions:

1. Get employees away from the fire. Evacuate and remain at the assembly points until released by a member of management.
2. Call 911
3. There is no obligation to fight a fire. Only use a fire extinguisher if you have been trained to use one. Do not attempt to fight a fire unless you have been trained. The following information is provided for those who have been trained.

FIRE FIGHTING INSTRUCTIONS

1. Don't fight electrical fires with water.
2. Approach all fires from the windward side.
3. Use dry chemical on oil, grease, and gasoline spills.

Fires are extinguished by:
1. Smother the fire and cut off the oxygen to the burning materials by use of dry chemical extinguishers.
2. Remove fuel.
3. First thing to do is cut off the power. Then use CO2 for electrical fires. Use dry chemical if CO2 is not available

TYPES OF EXTINGUISHERS

TYPE OF FIRE	DRY CHEMICAL	CARBON DIOXIDE
Class A - Cloth	Wood, Paper, Only with Triplex Powders	Very small fires ONLY
Class B - Flam. Liquids	YES	YES
Class C - Elec. Equipment	YES	YES
Class D - Combustible Metals	Special Powders	NO
Principal Extinguishing Effect	Smothering	Smothering
Method of Operating	Plunger, Valve or Trigger Type	Valve or Trigger Type
Effective Range	5-20 Feet	3-8 Feet
Duration of Charge	10-20 Seconds	10-20 Seconds

EXTINGUISHING AGENTS

TYPES OF MATERIAL (FIRE HAZARDS)	EXTINGUISHING AGENT
Alcohols and Isopropyl	CO_2, Dry Chemical
Natural Gas	CO_2, Dry Chemical Shut Off Gas
Electrical	CO_2, Dry Chemical **NO WATER**
Gasoline	CO_2, Dry Chemical
Propane	CO_2, Dry Chemical Shut Off Source
Polypropylene	CO_2, Dry Chemical
Hard Rubber Compounds	CO_2, Dry Chemical
Paper, Wood	CO_2, Dry Chemical

AUTOMATIC FIRE FIGHTING EQUIPMENT

The plant has an automatic sprinkler system throughout the plant. The sprinkler lines are supplied by city water pressure

The following is a list of Sprinkler System Operators and Alternates:

The Maintenance Supervisor or maintenance person on-shift.

Holidays:

Contact Maintenance Supervisor

Impairment

A. When the sprinkler system is being tested or repaired, it is said to be impaired. Employees must be notified of the impairment by the Maintenance Supervisor by pager announcement and e-mail that the system is being tested and/or repaired.
B. The Maintenance Supervisor will contact Chartis Global Loss Prevention (GLP) phone at 1-800-472-7819 or by e-mail at plc_impairments@hsb.com to notify them of the impairment.
C. Hot work and hazardous processes are suspended during the impairment.

Restoring the System

A. When the system is restored, the valve is locked in the open position.
Employees must be notified that the system has been restored by the Maintenance Supervisor by pager announcement and e-mail.
B. The alarm system is reset
C. The Maintenance Supervisor will contact Chartis Global Loss Prevention (GLP) by phone at 1-800-472-7819 or by e-mail at plc_impairments@hsb.com
to notify them of the system restoration.

SEVERE WEATHER

A. During actual or impending Severe weather, tornado or other natural disaster, the Human Resources Director, or the Production Manager (or their designated representative), will advise supervisors what role they will play (depending on the nature of the matter).

1. Remain calm. Do NOT attempt to evacuate.
2. If a tornado, go to the appointed in-plant shelter, which is an area that has low danger from flying glass and other objects.

SHELTER FOR:	**SHELTER**
Maintenance Shop, Quality Department, Plant Offices, Shipping	Cafeteria
Engineering, Corporate Offices, Cold form, Injection Molding Tool Room	Grind Room

RIOTS, CIVIL DISTURBANCES AND BOMB THREATS

A. During actual or impending civil disturbances, the Human Resources Director, or the Production Manager (or their designated representative), will advise supervisors what role they will play (depending on the nature of the matter).

1.Riots or demonstrations at the front gate or other plant entrances:

a. Employees are to remain at work
b. Employees will be advised by the supervisor
c. Human Resources Director will be responsible to take immediate steps to stop unauthorized entry and will assign plant patrols to protect property.

2. Violent riot, demonstration or picketing outside or within the plant: Supervisors will (as directed by the Production Manager):

a. Block and close all entrances
b. Notify Civil Authorities and request assistance

c. Call in key personnel listed on responsibility chart
d. Evacuate employees from affected areas

3.Non-violent demonstration or picketing outside of or within the plant:

a. Take measures to insure and provide safety for plant and employees, as directed
b. Call Civil Authorities for assistance, as appropriate
c. All employees are to proceed with work and should not have contact or discussions with those persons causing the disturbance
d. Any decision to shutdown operations and release employees will be made by the Site Manager or designee

BOMB THREAT PROCEDURE

Bomb threats may be received by telephone, mail, or in person. Company personnel likely to receive such threats should be informed of their responsibility to report any bomb threat immediately to the Manufacturing Vice President or in his absence to the Human Resources Director.

Personnel that may receive such threats are:

Personnel assigned to answer the switchboard or others

If a bomb threat is received by a telephone operator or others, the following action should be taken:

1. Obtain as much information as possible from the caller. Note the time of a call, the exact wording of the message, and the time the bomb is supposed to explode.
2. Immediately relay the message to the Human Resources Director or designee.
3. Do not discuss with others unless advised to do so.
4.The Human Resources Director or in designee will contact the Key Personnel designated in the location's emergency plan.

The action to be taken will be decided by the Manufacturing Vice President or in his absence to the Site Manager. Proper evacuation of the threat depends on the circumstances surrounding each threat. The main objective is to protect Company personnel. The secondary objective is to prevent or minimize damage to Company property.

The Milwaukee Police should be notified (911) immediately advising them of the bomb threat received. Any request for a Bomb Squad to report to the scene should be made by the Police Department.

DECISION TO EVACUATE

Minimizing the possible consequences of a bomb threat can result in serious injuries to personnel. Therefore, in the event any such threat is received, the first consideration must be given to the need for evacuation of an area, part of the plant, or entire plant. It may be prudent to promptly evacuate any unneeded personnel from the threat area.

If the threat is to an operating area, shutdown procedures should be started immediately.

The Site Manager must decide on the extent of the evacuation. If evacuation is determined necessary, then the following steps should be taken:

1. Supervision in the area affected will be notified to evacuate all personnel in their areas and effect emergency shutdown procedures.
    a. Supervision will verify at the assembly point that all employees, contractors, contract employees and visitors are out of the area.
    b. Supervisors will inform the authorities of and missing employees, contractors, contract employees and visitors.
2. Employees evacuated will be instructed to stand-by to be ready to return to work when notified. Employees normally will not be sent home.
3. Follow all Milwaukee Police Department instructions.

SEARCH

Supervisory Personnel are required to assist Milwaukee Police Department in any search because they are familiar with the physical layout of the location, can provide access to locked areas, know vital operating equipment, and can identify objects foreign to the premises

DISCOVERY OF A BOMB

All employees should report anything that looks suspicious including, but not limited to:

- A lunch box in an unexpected area
- A piece of pipe closed at both ends
- A ticking sound
- An object with wires
- An object that is out of place in surroundings, such as a package,
- Items in storage closets, or lockers used by cleaning people

If something suspected to be a bomb is found, **do not touch the object. Do not put it in water. Leave it strictly alone for the experts to handle.**

In the event a bomb or incendiary device is discovered:

1. **EVACUATE THE AREA** - All employees, contractors, contract employees and visitors must be evacuated from the area, including those at opposite ends of the plant.
2. Request the local Police Department to secure the services of a Bomb Squad.
3. Block the area where the bomb was discovered and permit **no one** to go in the area except plant officials, Police or the Fire Department.
4. Follow Fire or Police Department instructions. If requested, telephone the Ambulance service and request them to stand by.

Complete details of any bomb threat should be reported to the Human Resources Director..

SPILL CLEAN UP PROCEDURES

The purpose of this procedure is to prepare all applicable plant personnel for actions to be taken in the event of any spill. The response will be lead by Cold Form Manager, supported by the Maintenance Supervisor..

Refer to the Spill Prevention, Control and Countermeasures Plan (SPCC)

In the event of a spill, the employee first observing physical evidence of the spill would implement spill response procedures. The facility's spill response procedures are described below.

First Actions:

1. Upon noticing a spill, the employee first observing the spill estimates the hazard potential by determining at least the following factors:

a. The substance spilled and its hazard potential
b. The amount of the spill and the extent of spread c. The source of the leak or spill

2. The first observer of the spill notifies the Maintenance Supervisor or Site Manager. If the situation is life-threatening or warrants immediate attention, the first observer calls 911.

3. The area is secured, sewers are blocked off to prevent entry of oil, entrances to the spill site are blocked, and people are prevented from entering the contaminated area.

4. If the oil spill has reached a sewer or waterway or adjoining shoreline, the Maintenance Supervisor or Site Manager must contact the Milwaukee Metropolitan Sewerage District (MMSD), Wisconsin DNR and the National Response Center. All regulatory reporting is the ultimate responsibility of the Site Manager.

5. The following is to be noted:

a. Time and date of the discharge
b. Type of material discharged
c. Estimates of total quantity discharged
d. Source and cause of discharge
e. Description of all effected media
f. Any known damages or injuries
g. Actions being taken to stop, remove, and mitigate the effects of the discharge
h. Names of individuals and/or other organizations that been contacted

Spill Containment and Source Elimination

1. The spill responder(s) first attempt to contain the spill only if there is no threat to their safety, so as to prevent its entry into a storm sewer, a ditch, or any conveyance that eventually discharges to a waterway. The equipment that can be used by a Tulip Molded Plastics Corporation employee to contain spills can be found in the facility spill kits. The spill kit may

contain absorbent material, disposal bags, and personal protective equipment. Typically, a kit is capable of cleaning up to a 5-gallon or 25- gallon size spill of oil or other liquids. The spill kit(s) are typically located near the petroleum containing equipment or containers. If a larger quantity of oil is present, the used oil cart will be used to vacuum oil. If the oil cart is full, it will be emptied into oil recycling and brought back to pick up the remaining oil until the oil is picked up. Pads and rags will be used to pick up remaining oil and disposed of in drums

2. At the same time as containment is performed or as soon as possible after containment, the spill responder(s) should attempt to seal or otherwise stop the source of the spill. Common methods of eliminating a spill source include closing valves, applying a leak stopping compound for pinhole leaks, using drum over- packs, deactivating pumps, and diverting flow to another pathway with a goal of not allowing the spill to enter a sewer, waterway or adjoining shorelines.

3. Discharge to sewers is prevented by covering or creating a dike around manholes and catch basins.

Spill Cleanup and Mitigation for Common Size Spills

1. Shut off all vehicles and equipment in close proximity of the spill.
2. Use the spill kit to prevent the spill's entry into a storm sewer/catch basin, drains, or any conveyance that eventually discharges to a waterway.
3. Use absorbent on the spill without contacting the spill or stepping into the spill.
4. Work uphill into the spill to contain it to a small area and prevent any runoff.
5. Use a non-sparking broom and shovel to spread absorbent on the spill and work it around until the ground is completely dry.
6. Block off the area to stop vehicles from driving into or through the spill.
7. Once absorbents have had time to work, sweep it up into a shovel and place it in a covered disposal container. Mark the container as to its contents.
8. Notify the Maintenance Supervisor, as appropriate, for replacement of any spill kit materials or absorbents.

Spill Cleanup and Mitigation for Spills that will warrant the use of more than 3 bags of absorbent

1. Spill responder is to call the Site Manager to explain the nature of the spill, the location of the spill and what type of product was spilled.
2. The spill responder is to follow the procedures listed above.
3. The Site Manager is to assess the situation. If more than 40 gallons has been spilled or the spill has reached a sewer, all regulatory reporting is the responsibility of the Site Manager.

Spill Cleanup and Mitigation for Spills Outside of Our Training and Experience

1. Spill responder is to call the Site Manager to explain the nature of the spill, the location of the spill and what type of product was spilled.
2. The spill responder is to follow the procedures listed above, that can be safely completed. The spill responder must monitor the situation, and if necessary call 911 if the threat of the spill should change.
3. The Site Manager is to assess the situation. If the spill is outside of the training and experience of Tulip Molded Plastics Corporation personnel, an emergency response cleanup contractor will be contacted to collect the spilled material in the appropriate manner and place the

material into secure containers.
4. The area or surface in contact with the spilled material will be decontaminated by an appropriate method permissible under local, state, and federal laws. The method used depends upon the substance, the availability of permitted sewer discharge to a local publicly owned treatment works (POTW), regulatory standards applicable to hazardous and toxic wastes, and other factors. The emergency response cleanup contractor, in consultation with Tulip Molded Plastics Corporation management, will select the appropriate cleanup and decontamination method after determining the applicable facts.
5. Spill material and debris will be managed in a manner fully compliant with applicable local, state, and federal laws regarding recycling or disposal of wastes. All regulatory reporting is the responsibility of Tulip Molded Plastics Corporation.

Disposal of Recovered Materials

- Disposal of materials recovered after cleanup of a spill or leak is directed by the Site Manager in accordance with applicable federal and state regulations and requirements.

EMERGENCY TELEPHONE NUMBERS (In Case of Petroleum Leaks or Spills)

Wisconsin DNR Spill Hot Line	1-800-943-0003
EPA Region 5, SPCC Coordinator	(312) 866-7187
Wisconsin Emergency Management	(518) 457-4107
Milwaukee County Local Emergency Planning Commission	(414) 278-4709
National Response Center	1-800-424-8802
Fire Department	911 (emergency)
Milwaukee Metropolitan Sewerage District	(414) 272-5100

EMERGENCY EQUIPMENT LOCATIONS

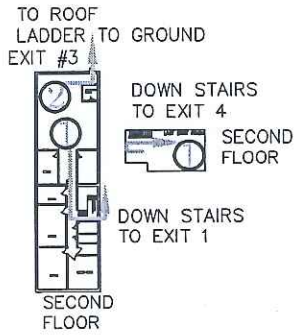
ITEM	LOCATION
Fire Extinguishers	Centrally located in all Plant Areas
Spare Extinguishers	Aisle by shipping office

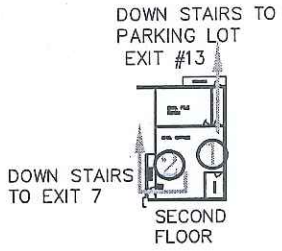
Attachments:

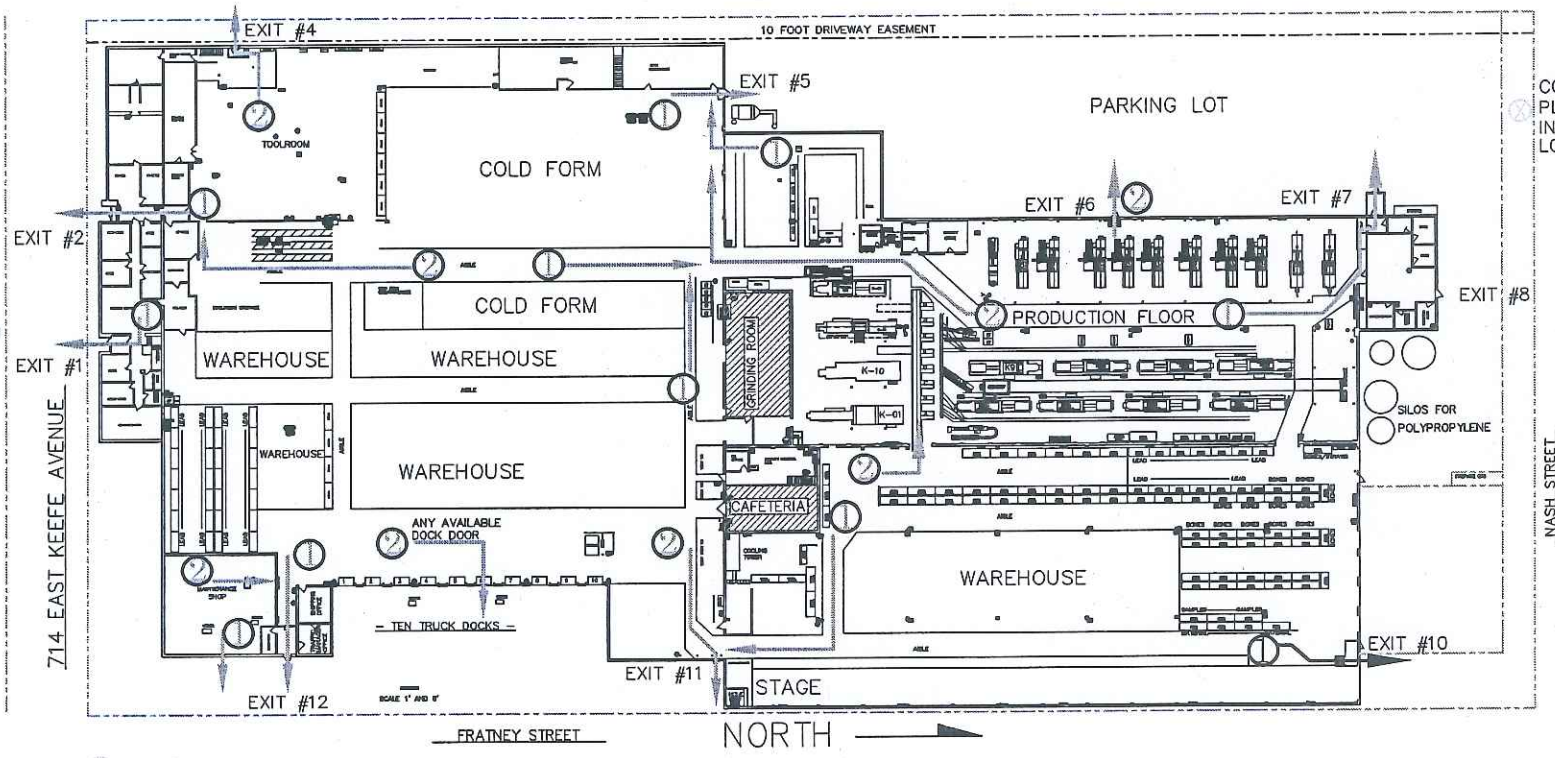
Evacuation Map
Medical Treatment Authorization

EMERGENCY ACTION PLAN

EVACUATION ROUTES
① PRIMARY ② SECONDARY
ASSEMBLY AREAS
SHELTERS







SHIPPING
CORNER OF FRATNEY AND KEEFE
ACROSS STREET FROM BUILDING

TULIP MOLDED PLASTICS CORP. - MILWAUKEE

02/2015

NAME	EXT.	DEPT.	Direct
Al Mitchell	213	Material Handler	(414) 906-8213
Al Schmidt	241	Senior Vice President Sales	(414) 906-8241
Anthony Fuerte	228	Cold Form. Manager	
Ben Krayzman	282	Design Engineer	
Brad Barbee	220	Customer Service Manager	(414) 906-8220
Carrie Stangel	271	Quality Manager	
Cheryl Fritsch	245	Production Asst	
Chris Gasser	218	C.F. Maint/Tooling Lead	
Chris Rtiz	258	3rd shift Supervisor	
Christopher Bruzas	272	Quality Assurance Intern	
Craig Kellogg	227	CEO/ President	(414) 963-6324
Dennis Lohman	258	Robot Supervisor nights	
Donna Ponik	231	Staff Accounting	
George Koleas	209	Human Resources Director	(414) 906-8209
Jacob Diers	214	Materials Mangager.	(414) 906-8214
James Kuehn	273	Site Manager	
Jim Biemling	283	Engineer	
Jim Voigt	284	Senior Design Engineer	(414) 906-8248
Joey Muhammad	226	Maintenance Supervisor	(414) 906-8226
John Giordano	258	2nd shift Supervisor	
Judy Hazard	205	Payroll Admin.	
Linda Ready	229	Sr. Quality Engineer	(414) 906-8229
Maria Scardino Hernandez	202	Customer Service Rep	(414) 906-8202
Mark Sauter	286	Production Design Supervisor	
Mark Whitaker	244	Toolroom Manager	(414) 906-8244
Matt Tom	225	Processing Eng.	
Mike Fritz	285	Robot Supervisor	
Nicole Ellmann	289	Ex.Asst.- A/R Admin	
Paul Paraskevopoulos	254	VP Operations	
Pat Bera	234	HR Admin Asst	(414) 906-8243
Ossai, Ifeyani	273	Engineer- Plastics	
Ray Dixon	258	1st shift Supervisor	
Brieanna Igl	250	Finance Intern	
Ryan Griffin	247	Manager Lead Div.	(414) 906-8247
Scott Kruchell	242	Production Clerk	
Sergio Cabada	219	C.F.O.	(414) 906-8230
Shawn Johnson	238	Lead Engineer	
Sue Turcotte	251	Accounts Payable	
Terri Hamilton	206	Cost aAcct/ IT Mamager	(414) 906-8206
Terry Evraets	215	Director Engineering	(414) 906-8215
Tom Blindauer	232	Cost Accountant	

MW FAX #'s

Main / Mailroom *(not available)*	(414) 962-1825
HR	(414) 963-3134
Payroll/Acct'ing	(414) 963-8625
Plant Back Office	(414) 906-8221
Sales / Customer Service	(414) 962-0309
Shipping	(414) 906-8257
Toolroom	(414) 963-0994

Other Extensions

Accounting Computer room	204
Cafeteria	252
Conferance Room-*Production/H.R.*	256
Conference Room-*Back Office/Plant*	274
Conference Room-*Executive/Sales*	239
Lead Lab	216
Mail Room	211
Production floor	223 & 280
Production Back office	273
QA lab	212 & 243
Shipping	213 & 214
Supervisor Office	258
Switchboard / Operator	0

Basic Icon Phone Functions

To PAGE :
press PAGE ALL key

To place/pick up a PARKED call :
press PARK key (1-2 or 3)

To TRANSFER : press
TRANSFER key & extension

To HOLD / DO NOT DISTRUB: press
HOLD/DND key.

Vacant numbers	
233	Controller
272	Back Office

EMERGENCY / MILWAUKEE FIRE DEPARTMENT

9-1-1

EMERGENCY COORDINATOR

George Koleas 262-251-7216 or Ex 206.

California

(626) 968-9680 Main Phone
(626) 333-3610 Upstairs Fax
(626) 333-5883 Downstairs Fax
Fred T. ex. 306

14955 E. Salt Lake Avenue
City of Industry, CA 91746

Niagara Falls

(716) 282-1261 Phone
(716) 285-6075 Fax

Craig Kellogg	221	When in NF
David DeLange	224	HR Manager
Frank Sophia	227	Corp.Purch Manager
John Signore	215	Gen. Manager-Repro
Mary Jane B.	232	Inv/Pro Control
Nancy Donald	214	Payroll/ Sceduling
Patti Metro	247	HR-Admin
Paul P.	213	When in NF
Rob Johnson	240	Ooperations Man.
Steve Shoecraft	229	Plant Engineer
Tom Neubauer	243	Shipping
Victor Monter	223	Quality Manager

3125 Highland Avenue
Niagara Falls, NY 14305

Milwaukee

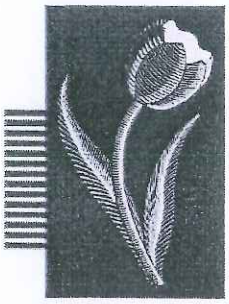
MW Switchboard Operator / 0 (414) 963-3120
Night Line (414) 963-3130

715 East Keefe Ave
Milwaukee, WI, 53212.

Website www.tulipcorp.com

S:\PHONES\MW PHONE ext & direct

MSH 02/2015



TULIP MOLDED PLASTICS CORPORATION

Environmental Education:

HANDLING/DISPOSAL-WASTE AND RECYCLABLE ITEMS

This training is to make you aware of guidelines for handling, storage, labeling and disposal of environmentally sensitive and recyclable materials.

General Trash

Receptacles labeled **"General Trash"** are located through out the plant and office. **This CANNOT include anything that is contaminated or mixed with lead**. Acceptable trash includes:

- Plastic banding from cardboard bundles and plastic bottles
- Aluminum cans and other recyclable aluminum
- Empty propane canisters
- All exhaust filters from the coating spray booth and any other waste material that may be contaminated with hardened coating material is considered non-hazardous.
- Floor sweepings including clean plastic and **NO Lead**
- Polypropylene soaked with oil after oil has been drained off

To discard trash, take it to the ***north end of the warehouse, open the overhead door labeled*** **"Garbage Only No Recyclables"**, ***and dump the trash into the dumpster.***

Plastics

All Polypropylene material from presses is to be placed in **"Scrap for Grinding"** bins throughout the molding department to be recycled in the Grinding Room.

Filled Gaylords are to be taken to ***the designated area.***

Metal

There are 55 gallon black metal drums located throughout the plant for the disposal of the metal. This includes:

- Banding could be cut with metals cutters into smaller strips or bent to fit into the drum.
- Scrap steel, metal chips, scrap metal, burnt motors, etc.

- Bulb Ballast will be processed following the same procedure as **"Used Lights and Bulbs"**, ***located in the old boiler room located in the southeast corner of the building.***

Used Electronics

All used electronics such as computers, monitors, printers, laptops, etc. are accumulated in accounting. As needed, ***Maintenance will arrange for disposal.***

Batteries (Dry Cell)

Maintenance personnel will place batteries in containers holding batteries labeled as **"Dry Cell Battery Recycling"** ***located on a cart between the maintenance supervisor's office and the production supervisors office. Maintenance will arrange for disposal.***

Batteries (Lead Acid)

Maintenance personnel will place batteries on the bottom of a cart labeled **"Lead Acid Battery Storage"** ***located between the maintenance supervisor's office and the production supervisors office. Maintenance will arrange for disposal.***

Mercury Containing Equipment

Maintenance personnel will place batteries in containers holding Mercury Containing Equipment labeled as **"Mercury Device Recycling"** ***located on a cart between the maintenance supervisor's office and the production supervisors office. Maintenance will arrange for disposal.***

Lead

Scrap lead terminals without plastic, lead debris from boxes, lead debris that is shaken off or that falls from the vibrator bowl feeders, robots or molds, are is to be ***put into red tote boxes and taken to Cold Form for recycling.***

Lead Dross Recycling

Dross removed from the melting furnace or casting machine must be placed in 55 gallon or 30 gallon steel drums.

Lead contaminated with hydraulic oil should be placed in the Lead Dross 55 gallon or 30 gallon steel drums.

- Drums are to be 1A2 bolt ring top drums.
- Dross drums must be free of lead on the outside of the drum before they leave the facility.
- Every drum must be identified with two labels; A **"Material for Recycle"** label that identifies **"LEAD DROSS"** and a **"DOT"** identification label. Information must be legible.

- Lead dross drums must be removed from the Cold Form Department as soon as they are filled and sealed. **Three (3) drums of accumulating lead dross may be kept in the Cold Form Department at any one time.** Two (2) drums are located at the furnace and one (1) drum is located at the caster.

Lead dross awaiting shipment and empty drums used for lead dross are only be stored ***in the drum storage area located to the east of the Cold Form Department.***

Water Recycling

Water used to clean floors or machines will be evaporated using a water evaporation unit labeled **"Mop and Scrub Water"**, ***located in the old boiler room located in the southeast corner of the building.***

- Water for evaporation will be accumulated in 55 gallon drums and transported, when full to the evaporation unit
- Drums are to be 1A2 bolt ring top drums.
- Every drum must be identified with two labels; a **"Hazardous Material"** label that identifies **"WASTE WATER"** and a **"DOT"** identification label. Information must be legible.
- Every drum must be identified with the start date of accumulation.

Only authorized personnel are allowed to operate the drum evaporation unit.

The remaining residue will be added to the drum containing lead dross recycling ***in the drum storage area located to the east of the Cold Form Department.***

Lead Contaminated Waste Recycling

Contaminated Waste consists of any garbage that **is mixed or contaminated with lead.** This to include but not limited to:

- Oil dry from floor mixed with lead
- Dirt from floor mixed with lead.
- Floor sweepings with plastic and lead mixed.
- Vacuumed lead
- Used knit gloves worn by Cold Form and Plastics employees.
- Used filters from baghouse.
- Used filter bags from baghouse.
- Any scrap or garbage that is 50% or more lead

Every Contaminated Waste drum must be identified with two labels: a **"Material for Recycle"** that identifies **"Contaminated Waste"** and a **"DOT"** identification label.

Maintenance management will arrange for pick-up and disposal of all waste and recyclable items.

Used Oil